October 20, 2005

National Animal Identification System
VS, APHIS
4700 River Road, Unit 220
Riverdale, MD 20737-1238

RE: Docket No. 05-069-1, Public Meeting Concerning the Animal Movement Tracking Database

The National Dairy Herd Improvement Association (DHIA), which represents over 27,000 dairy operations and its producers from across the nation, with 4.2 million producing cows, appreciates the opportunity to provide comments on the privatization of the animal movement tracking database. Our comments are based in part on over 70 years of experience in the partnership of public/private databases. The DHIA system, a private service provider, collects producer data and provides value-added management records for members. A potion of the information collected is submitted to a public database, maintained by USDA that is used for research and the determination of genetic evaluations of individual animals by the Animal Improvement Program Laboratory (AIPL) of USDA ARS. This system has worked to the benefit of all.

National DHIA and the dairy industry strongly support the development and implementation of the National Animal Identification System. Producers and staff have invested significant time and resources working together with other industry representatives to develop the framework for the national plan. Producers recognize the importance of the developing system for protecting their animals and assuring the public of ready access to a plentiful food supply. Traceback challenges experienced in recent Bovine Spongiform Encephalopathy and bovine tuberculosis cases have demonstrated vividly the need for a fully functional animal ID system. The system that evolves must work properly, have credibility with producers, the public and the international community, and include all species if it is to truly meet the objectives of all parties who will rely on the system.

Based on experience, National DHIA knows that the system will work and that dairy producers can and will work with it. The DHIA system has used premise and animal ID for over 100 years, thus we have extensive experience in working with the primary tools necessary for the NAIS. In addition, during the past year National DHIA and two of our field service affiliates have worked in a cooperative agreement with the Pennsylvania Department of Agriculture to begin the implementation of the ID system in the state. Approximately 50,000 dairy animals have been RFID tagged with their AIN number and movement data transferred by DHIA to the state animal movement repository. We know that the system that has been proposed will work, that dairy producers and the DHIA system can work effectively with the system and that it is a relatively painless procedure for all parties. It is an example of private and public databases working together to capture the needed data in a manner that works for all. The private system captures the data and transfers those few pieces needed to the public database for storage and appropriate use by animal health officials. While there are costs, they are shared in a reasonable manner. It is critical that these concepts be carried forward in the national system. Producers should not be mandated to carry that full cost of a system that benefits all.

The combined dairy industry is committed to working to move the ID effort forward. During World Dairy Expo in early October, an industry coalition called iDairy was introduced. Six major national dairy organizations (American Jersey Cattle Assoc, Holstein USA, Inc., National Association of Animal Breeders, National DHIA, National Milk Producers Federation and Professional Dairy Heifer Growers Association) have joined together in this effort, so that there is a unified voice for the industry in the field for producers and at the table for working with other partners to develop the system.   With iDairy, we are moving forward aggressively to position the industry to implement the ID system. The initial focus is education to encourage producers to register their premises. As iDairy moves forward, producers will also be encouraged to use "official" RFID tags on their animals. To do this it is necessary to have USDA release their approval process for Animal Identification Number (AIN) tag manufacturers and AIN managers. Identification of the parties officially authorized to work with these activities is necessary for the system to move forward.

Basic needs for the NAIS, including the animal movement tracking database include:
- A complete animal identification system that is credible with producers, the public and the international community.
- Unfettered 24/7 access to animal movement data by appropriate state and federal animal health officials.
- The system must include all species and address needs and concerns of all parties involved in the production, movement, marketing and harvesting of animals. The governance structure needs to assure representation of all segments of the industry.
- Efforts must continue to identify and use appropriate data that is already being collected so that costs and reporting burdens can be minimized for all parties.
- The NAIS serves a "Common Good", so the use of public funds to support the development, implementation and maintenance of the system must be continued. Cost sharing is appropriate, but producers should not be required to bear the total cost of developing and operating the data tracking system.
- Steps should be taken to protect the confidentiality of producer data to the extent possible.

National DHIA and the dairy industry urge all parties to move forward with the rapid implementation of a national ID system that will work effectively and efficiently for all, allowing needed data access by appropriate state and federal animal health officials, with costs shared by all parties. We look forward to actively participating in ongoing discussion, development and implementation of the system. Thank you for the opportunity to submit these comments.